

IN RE: CRAIG BRADLEY DEIMLER and : CHAPTER 13
WILLIAM OLIVER FISHER-DEIMLER :
Debtors :
 :
JACK N. ZAHAROPOULOS :
STANDING CHAPTER 13 TRUSTEE :
Movant :
 :
vs. :
 :
CRAIG BRADLEY DEIMLER and :
WILLIAM OLIVER FISHER-DEIMLER :
Respondents : CASE NO. 1-20-bk-00841

AND NOW, this 28th day of July, 2023, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

a. Residential real estate. The Trustee has requested proof of the value of the debtors' home as stated in their schedules. Need Listing Agreements for real estate to be sold in the Fifth Amended Plan.

- a. The plan is inconsistent with Proofs of Claims filed and/or approved by the Court. No Proof of Claim for Harrisburg School District/City of Harrisburg.
- b. Plan ambiguous – Payment. Amount to pay on arrears to Allegro Credit is ambiguous – no amount provided in plan.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/Douglas R. Roeder
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 28th day of July, 2023, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Gary Imblum, Esquire
4615 Derry Street
Harrisburg, PA 17111

/s/Deborah A. DePalma
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee4